

Phase I Environmental Site Assessment

55-Acre Commercial Site
College Park, Fulton County, Georgia

May 7, 2020

Prepared for:
City of College Park
US EPA Cooperative Agreement: #BF-00D94219-0



Assigned for use by:
City of College Park Business & Industrial
Development Authority

Phase I Environmental Site Assessment

Prepared for: City of College Park
3667 Main Street
College Park, Georgia 30337
Cooperative Agreement BF-
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Project Name: **Phase I Environmental Site Assessment**
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ACRES Property ID: 241637

Cardno Project #: 0002304013

Date: May 7, 2020

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1 Executive Summary

Cardno has completed a Phase I Environmental Site Assessment (ESA) of the vacant 55-Acre Commercial Site located in College Park, Fulton County, Georgia, approximately 1.10 miles southwest of downtown College Park. The study area, consisting of 10 vacant parcels, is herein referred to as "the Subject Property" or "the Site." According to information provided by Fulton County Tax Assessor records, the Subject Property consists of approximately 55 acres (**Figures 1 and 2a**). All parcels were undeveloped with the exception of Parcel #6 which supported the former Kathleen Mitchell Elementary School, which consisted of one 43,000 square-foot school building and two small storage buildings. Photos of the Subject Property and surrounding properties taken during the site visits are provided in **Appendix A**. This assessment was performed under and was funded by the City of College Park Environmental Protection Agency (EPA) Brownfield Assessment Grant.

This assessment was performed to satisfy the requirements of the Client (City of College Park) and their assigns College Park Business & Industrial Development Authority (BIDA) with respect to potential environmental impairment and liabilities associated with the property due to contamination by hazardous substances, controlled substances, or petroleum products on or near the site.

This Phase I Environmental Site Assessment generally follows the scope of ASTM Designation: E 1527-13 – Standard Practice for Environmental Site Assessments. This report meets the general requirements for conducting all appropriate inquiry into the previous ownership, uses, and environmental conditions of a property, as specified in 40 CFR Part 312, Standards and Practices for All Appropriate Inquiries. Furthermore, this work was conducted by or under the responsible charge of an environmental professional as defined in 40 CFR §312.10.

ASTM Standard Practice E1527-13 defines a Recognized Environmental Condition (REC) as:

"The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: 1) due to any release to the environment, 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment. The term is not intended to include *de Minimis* conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies."

ASTM Standard Practice E1527-13 defines a Controlled Recognized Environmental Condition (CREC) as:

"A recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls)."

ASTM Standard Practice E1527-13 defines a Historical Recognized Environmental Condition (HREC) as:

"A past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable

regulatory authority or meeting unrestricted residential use criteria established by a regulatory authority, without subjecting the property to any required controls."

1.1 Findings and Conclusions

Cardno has performed this Phase I Environmental Site Assessment (ESA) of the property in conformance with the scope and limitations of *ASTM Standard Practice E1527-13*. Any exceptions to, or deletions from, this practice are described in Section 2.0 of this report. This assessment has not revealed potential recognized environmental conditions (RECs) in connection with the Subject Property. A *de minimis* condition was revealed:

FINDINGS AND CONCLUSIONS SUMMARY						
Report Section		Further Action?	<i>De minimis</i> Condition	REC and/or CREC	Historical REC	Description
4.0	User Provided Information	No	No	No	No	
5.1	Federal, State and Local Database Findings	No	No	No	No	
5.2	Additional Environmental Record Sources	No	No	No	No	
5.3	Local Environmental Record Sources	No	No	No	No	
5.3	Historical Records Sources	No	No	No	No	
6.2	Hazardous Substance Use, Storage and Disposal	No	No	No	No	
6.3	Underground Storage Tanks	No	No	No	No	
6.4	Aboveground Storage Tanks	No	No	No	No	
6.5	Other Petroleum Products	No	No	No	No	
6.6	Polychlorinated Biphenyls (PCBs)	No	No	No	No	
6.7	Unidentified Substance Containers	No	No	No	No	
6.8	Nonhazardous Solid Waste	No	Yes	No	No	Several piles of tires, piles of shingles, scrap metal, and debris were observed throughout the Subject Property.
6.9	Wastewater	No	No	No	No	
6.10	Waste Pits, Ponds and Lagoons	No	No	No	No	
6.11	Sumps	No	Yes	No	No	Drains were observed in connection with the kitchen of the former Kathleen Mitchell Elementary School
6.12	Septic Systems	No	No	No	No	
6.13	Storm Water Management System	No	No	No	No	
6.14	Wells	No	No	No	No	
7.0	Subsurface Vapor Migration	No	No	No	No	
8.0	Interviews	No	No	No	No	
9.1	Asbestos Containing Material	Yes	No	No	No	Identified ACM
9.2	Lead-Based Paint	Yes	No	No	No	Identified LBP

Based on this Phase I ESA, there are no RECs in association with the Subject Property.

During the course of the investigation, Cardno completed a comprehensive pre-demolition asbestos and limited lead-based paint survey on the on-site buildings. Cardno identified the following non-scope issues on these buildings:

Asbestos Containing Materials

Asbestos containing materials (ACMs) were identified throughout the interior/exterior of the buildings including:

Former Kathleen Mitchell Elementary School

- Gray 9"x9" vinyl floor tile (VFT) with associated black mastic, located throughout the building, totaling approximately 43,000 square feet (SF).
- Joint compound on drywall, located throughout the building, located throughout the building, totaling approximately 6,500 SF.
- Black mastic underlain by white 12"x12" VFT, located throughout the building, totaling approximately 43,000 SF.
- White door caulk, located in Hall 2 and Hall 3, totaling approximately 150 LF.
- Boiler mastic, located in the boiler room, totaling approximately 150 SF.
- 6-inch pipe elbows, located throughout the building, totaling approximately 60 LF.
- 12-inch pipe elbows, located throughout the building, totaling approximately 60 LF.
- White pipe wrap, located throughout the building, totaling approximately 100 LF.
- Transite piping, located in the kitchen, totaling approximately 50 LF.
- Beige window caulk, located in the cafeteria, totaling approximately 180 LF.
- Built-up roof tar, located on the roof, totaling approximately 43,000 SF.
- Gray caulk around fire extinguisher cabinets, located in Halls 1,2 and 3, totaling approximately 60 LF.

Storage Building 1

- No ACMs were identified in Storage Building 1.

Storage Building 2

- No ACMs were identified in Storage Building 2.

Most of these materials were in very poor condition, and inextinguishable from non-ACM debris. Given the poor condition, all building materials, with the exception of the concrete slab foundation, concrete mason unit (CMU) walling, and metal framing, should be considered friable ACM

Lead-Based Paint

Lead-based paint was identified on various painted surfaces throughout the interior/ exterior of the buildings including:

Former Kathleen Mitchell Elementary School

- Interior yellow paint on concrete masonry units (CMU), located in the cafeteria, totaling approximately 80 LF.
- Interior white paint on metal door frame, located in Bathroom 8, totaling approximately 60 LF.

- Interior brown paint on metal door frame, located in Hall 3, totaling approximately 30 LF.

Storage Building 1

- No LBPs were identified in Storage Building 1.

Storage Building 2

- No LBPs were identified in Storage Building 2.

Most of the identified painted surfaces were in very poor condition, with peeling and deterioration noted.

Please note: This is a cursory summary of findings. The full report must be read in its entirety for a comprehensive understanding of the stated conclusions/recommendations.

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2 Introduction

2.1 Purpose

The purpose of this Phase I ESA was to identify RECs in connection with the property at the time of the site reconnaissance. The scope of work for this Phase I ESA may also include certain potential environmental conditions beyond the scope of *ASTM Standard Practice E1527-13*. This report documents our findings, opinions, and conclusions.

2.2 Detailed Scope of Services

This Phase I ESA was conducted in general accordance with the *ASTM Standard Practice E1527-13*, consistent with a level of care and skill ordinarily practiced by the environmental consulting profession currently providing similar services under similar circumstances. Significant additions, deletions or exceptions to *ASTM Standard Practice E1527-13* are noted below or in the corresponding sections of this report. The scope of this assessment included an evaluation of the following:

- Physical setting characteristics of the property through a review of referenced sources such as available topographic maps and geologic, soils and hydrogeological reports.
- Usage of the property, adjoining properties and surrounding area through a review of referenced historical sources such as land title records, fire insurance maps, city directories, aerial photographs, prior reports and interviews.
- Observations and interviews regarding current property usage and conditions including: the use, treatment, storage, disposal or generation of hazardous substances, petroleum products, hazardous wastes, nonhazardous solid wastes and wastewater.
- Usage of adjoining and surrounding area properties and the likely impact of known or suspected releases of hazardous substances or petroleum products from those properties in, on or at the property.
- Information in referenced environmental agency databases and local environmental records, within the specified approximate minimum search distance from the property.
- Potential for subsurface vapor migration in, on or at the property.
- Comprehensive pre-demolition ACM and limited LBP survey of the on-site buildings

No additional investigations or other quantitative/qualitative testing was performed as part of this assessment, and no other work was performed as part of this assessment that was not required by the *ASTM Standard Practices E1527-13*. These non-scope issues include, but are not limited to, the following: Radon, Lead in Drinking Water, Wetlands, Regulatory Compliance, Cultural and Historic Resources, Industrial Hygiene, Health and Safety, Geotechnical Evaluation, Sinkhole Evaluation, Ecological Resources, Endangered Species, Indoor Air Quality, Vapor Intrusion, Biological Agents, and Mold.

2.3 Significant Assumptions

While this report provides an overview of potential environmental concerns, both past and present, the environmental assessment is limited by the availability of information at the time of the assessment. It is possible that unreported disposal of waste or illegal activities impairing the environmental status of the property may have occurred which could not be identified.

The conclusions and recommendations regarding environmental conditions that are presented in this report are based on a scope of work authorized by the Client. Please note however, that virtually no scope of work, no matter how exhaustive, can identify all contaminants or all conditions above and below ground. Cardno also assumes that the Client and other interested parties will read this report in its entirety.

2.4 Limitations, Exceptions, Deviations and/or Data Gaps

Cardno has prepared this Phase I ESA report using reasonable efforts to identify recognized environmental conditions associated with hazardous substances or petroleum products in, on or at the property. Findings contained within this report are based on information collected from observations made on the day (December 23, 2019) of the site reconnaissance and from reasonably ascertainable information obtained from certain public agencies and other referenced sources.

The *ASTM Standard Practice E1527-13* recognizes inherent limitations for Phase I ESAs, including, but not limited to:

- *Uncertainty Not Eliminated* – A Phase I ESA cannot completely eliminate uncertainty regarding the potential for recognized environmental conditions in connection with any property.
- *Not Exhaustive* – A Phase I ESA is not an exhaustive investigation of the property and environmental conditions on such property.
- *Past Uses of the Property* – Phase I requirements only require review of standard historical sources at five-year intervals. Therefore, past uses of property at less than five-year intervals may not be discovered.

Users of this report may refer to *ASTM Standard Practice E1527-13* for further information regarding these and other limitations. This report is not definitive and should not be assumed to be a complete and/or specific definition of all conditions above or below grade. Current subsurface conditions may differ from the conditions determined by surface observations, interviews, and reviews of historical sources. The most reliable method of evaluating subsurface conditions is through intrusive techniques, which are beyond the scope of this report. Information in this report is not intended to be used as a construction document and should not be used for demolition, renovation, or other property construction purposes. Any use of this report by any party, beyond the scope and intent of the original parties, shall be at the sole risk and expense of such user.

Cardno makes no representation or warranty that the past or current operations at the property are, or have been, in compliance with all applicable federal, state and local laws, regulations and codes. This report does not warrant against future operations or conditions, nor does it warrant against operations or conditions present of a type or at a location not investigated. Regardless of the findings stated in this report, Cardno is not responsible for consequences or conditions arising from facts not fully disclosed to Cardno during the assessment.

An independent data research company provided the government agency database referenced in this report. Information on surrounding area properties was requested for approximate minimum search distances and is assumed to be correct and complete unless obviously contradicted by Cardno's observations or other credible referenced sources reviewed during the assessment. Cardno shall not be liable for any such database firm's failure to make relevant files or documents properly available, to properly index files, or otherwise to fail to maintain or produce accurate or complete records.

Cardno makes no warranty, guarantee or certification regarding the quality, accuracy, or reliability of any prior report provided to Cardno and discussed in this Phase I ESA report. Cardno expressly disclaims any and all liability for any errors or omissions contained in any prior reports provided to Cardno and discussed in this Phase I ESA report.

Cardno used reasonable efforts to identify evidence of aboveground and underground storage tanks and ancillary equipment on the property during the assessment. "Reasonable efforts" were limited to observation of accessible areas, review of referenced public records, and interviews. These reasonable efforts may not identify subsurface equipment or evidence hidden from view by things including, but not limited to, vegetation, paving, construction activities, stored materials, and landscaping.

Any estimates of costs or quantities in this report are approximations for commercial real estate transaction due diligence purposes and are based on the findings, opinions and conclusions of this assessment, which are limited by the scope of the assessment, schedule demands, cost constraints, accessibility limitations and other factors associated with performing the Phase I ESA. Subsequent determinations of costs or quantities may vary from the estimates in this report. The estimated costs or quantities in this report are not intended to be used for financial disclosure related to the *Financial Accounting Standards Board (FASB) Statement No. 143, FASB Interpretation No. 47, Sarbanes/Oxley Act* or any United States Securities and Exchange Commission reporting obligations, and may not be used for such purposes in any form without the express written permission of Cardno.

Cardno did not act as a professional title insurance or land surveyor firm as part of this investigation, and makes no guarantee, express or implied, that any land title records acquired or reviewed in this report, or any physical descriptions or depictions of the property in this report, represent a comprehensive definition or precise delineation of property ownership or boundaries.

The Environmental Professional Statement in Section 1.1 of this report does not "certify" the findings contained in this report and is not a legal opinion of such Environmental Professional. The statement is intended to document Cardno's opinion that an individual meeting the qualifications of an Environmental Professional was involved in the performance of the assessment and that the activities performed by, or under the supervision of, the Environmental Professional were performed in conformance with the standards and practices set forth in 40 CFR Part 312 per the methodology in *ASTM Standard Practice E1527-13* and the scope of work for this assessment.

Per *ASTM Standard Practice E1527-13, Section 6, User Responsibilities*, the User of this assessment has specific obligations for performing tasks during this assessment that will help identify the possibility of recognized environmental conditions in connection with the property. Failure by the User to fully comply with the requirements may impact their ability to use this report to help qualify for Landowner Liability Protections (LLPs) under Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Cardno makes no representations or warranties regarding a User's qualification for protection under any federal, state or local laws, rules or regulations.

In accordance with the *ASTM Standard Practice E1527-13*, this report is presumed to be valid for a six-month period. If the report is older than six months, the following information must be updated in order for the report to be valid: (1) regulatory review, (2) site visit, (3) interviews, (4) specialized knowledge and (5) environmental liens search. Reports older than one year may not meet *the ASTM Standard Practice E1527-13* and therefore, the entire report must be updated to reflect current conditions and property-specific information.

No significant deviations or data gaps likely to affect the environmental professional's ability to identify RECs were observed or encountered during preparation of this report.

2.5 Special Terms and Conditions (User Reliance)

This report is for the use and benefit of, and may be relied upon by the City of College Park Business & Industrial Development Authority (BIDA), as well as any of their affiliates respective successors and assigns, in connection with a commercial real estate transaction involving the property, and in accordance with the terms and conditions in place between Cardno and the Client for this project. Any third party agrees by accepting this report that any use or reliance on this report shall be limited by the exceptions and limitations in this report, and with the acknowledgment that actual site conditions may change with time, and that hidden conditions may exist at the property that were not discovered within the authorized scope of the assessment. Any use by or distribution of this report to third parties, without the express written consent of Cardno is at the sole risk and expense of such third party.

Cardno makes no other representation to any third party except that it has used the degree of care and skill ordinarily exercised by environmental consultants in the preparation of the report and in the assembling of data and information related thereto. No other warranties are made to any third party, either expressed or implied.

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3 Site Description

3.1 Location and Legal Description

The Subject Property is located within College Park, Georgia, approximately 1.1 miles southwest of its downtown. The Subject Property has been comprised of vacant, wooded land (as generally depicted in **Figures 1 and 2a**), with the exception of the former Kathleen Mitchell School located on the north central portion. The Subject Site is bordered to the east and west by interspersed single-family homes and commercial facilities; north by Camp Creek Parkway and south by The Villages of College Park apartments and undeveloped land.

The Subject Site is comprised of 10 contiguous parcels, ranging in size from 0.3372 to 20.87 acres, all owned several separate entities. Each parcel, Fulton County parcel identification number, acreage, and nearby street are listed below (as generally depicted in **Figures 2a-b**).

Parcel	Parcel Identification #	Acreage	Adjoining Street / Address
1	14 019300020204	0.427	Paul D. West Drive
2	14 019300020196	0.3994	2479 Paul D. West Drive
3	14 019300020337	0.3372	Paul D. West Drive
4	14 019300020329	0.5366	Paul D. West Drive
5	14 0004 LL0653	4.09	Herschel Road
6	13 0004 LL0133	10.3	Paul D. West Drive
7	13 0004 LL0554	9.9	Paul D. West Drive
8	13 0005 LL0363	5.2	Riverdale Road
9	13 0005 LL0231	18.986*	First Avenue
10	13 0004 LL0646	20.87	Herschel Road

*Portion not included in Subject Site

The Subject Site incorporates all parcels with the exception of Parcel #9. Specifically, there is a portion of Parcel #9 that extends from Camp Creek Parkway to First Avenue and encompasses right-of-ways on each side of Global Gateway Connector. According to the Fulton County Tax Assessor, the only parcel with a listed address is Parcel #2 at 2479 Paul D. West Drive. Further, according to the Fulton County Tax Assessor, a school (former Kathleen Mitchell Elementary School) is located on Parcel #6 but does not list square-footage of the building or building plans.

3.2 Surrounding Area General Characteristics

The Subject Site is located in an undeveloped, residential, and commercial area southwest of downtown College Park, Georgia.

Historically, the surrounding area has been undeveloped or interspersed with single-family residences since the 1920s. North of the Subject Property lies Camp Creek Parkway, a major road throughout the area; Herschel Road lies to the west of the Subject Property; undeveloped land and Global Gateway Connector lies to the east; and undeveloped land and The Village of College Park apartments lies to the south.

The majority of the surrounding properties are commercial and residential. Specific adjacent and abutting properties are summarized in Section 3.5. A surrounding land use map is included as **Figure 3b**.

3.3 Current Use of the Property

At the time of this report, the Subject Property was undeveloped/wooded land. An abandoned school (former Kathleen Mitchell Elementary School) was observed on Parcel #6 (as depicted on **Figure 3a**).

3.4 Descriptions of Property Improvements

Approximate Size of Property	55 acres
General Topography of Property	The Subject Site slopes to the south-southwest and northeast.
Adjoining and/or Ingress/Egress Roads	Paul D West Drive, Herschel Road, and Global Gateway Connector provides access to the Subject Property
Paved Areas	Subject site is partially paved with a driveway extending from Paul D West Drive
Unimproved Areas	Approximately 90% unimproved; Parcel #6 is developed with the former Kathleen Mitchell Elementary School
Landscaped Areas	Approximately 90% wooded
Surface Water	None
Potable Water Source	City of College Park
Sanitary Sewer Utility	Available
Electrical Utility	Available
Natural Gas Utility	Available
Current Occupancy Status	Vacant
Unoccupied Buildings/Spaces/Structures	Building slab foundation at 2479 Paul D. West Drive The former Kathleen Mitchell School building remains standing along with two smaller maintenance sheds
Building Name or General Building Description	Former Kathleen Mitchell Elementary School
Number of Floors	Former Kathleen Mitchell Elementary School: One Storage Building 1: One Storage Building 2: One
Approximate Total Square Footage of Structure(s)	Former Kathleen Mitchell Elementary School: 43,000 square feet Storage Building 1: 150 square feet Storage Building 2: 150 square feet
Approximate Construction Completion Year	1960

3.5 Current Uses of Adjoining Properties

Direction from Property	Occupant(s) Name	Current Use	Potential REC(s)
North	Camp Creek Parkway	Highway	None
East	PreFlight Airport Parking	None – Vacant/undeveloped Airport parking	None
South	The Village of College Park Apartments	Apartments Vacant land	None
West	None	Residential	None

4 User Provided Information

4.1 Title Records

This service was not requested by the Client as part of this assessment, nor did the User (Client) provide title record information. According to the Fulton County Board of Assessors, the various parcels are owned by several local municipalities and private owners (see section 4.5).

4.2 Environmental Liens or Activity and Use Limitations (AULs)

The User provided no information regarding property environmental liens or activity and use limitations. However, any liens and AULs associated with the property (if any) are anticipated to be addressed by the End User/Current Site Owner as part of the land/title transaction process.

4.3 Specialized Knowledge

The User provided no specialized knowledge regarding recognized environmental conditions associated with the property (**Appendix B**).

4.4 Valuation Reduction for Environmental Issues

The User provided no information regarding a significant valuation reduction for environmental issues associated with the property (**Appendix B**).

4.5 Owner, Property Manager, and Occupant Information

Below summarize the various owners of the 10 parcels.

Parcel	Parcel Identification #	Occupant Status	Property Owner
1	14 019300020204	Vacant	William D. King
2	14 019300020196	Vacant	Larry E. Brown
3	14 019300020337	Vacant	College Park BIDA
4	14 019300020329	Vacant	Fulton County
5	14 0004 LL0653	Vacant	The Trust of Gwendolyn W. Jordan Revocable Living
6	13 0004 LL0133	Vacant	College Park BIDA
7	13 0004 LL0554	Vacant	The Trust of Gwendolyn W. Jordan Revocable Living
8	13 0005 LL0363	Vacant	City of Atlanta
9	13 0005 LL0231	Vacant	City of Atlanta
10	13 0004 LL0646	Vacant	The Trust of Gwendolyn W. Jordan Revocable Living

4.6 Reason for Performing Phase I

This assessment was performed to satisfy the requirements of the Client and other interested parties with respect to potential environmental impairment associated with the property due to contamination by hazardous substances, controlled substances, or petroleum products on or near the site.

5 Records Review

The purpose of the records review is to obtain and review records that will help identify RECs in connection with the property. Some records reviewed pertain not only to the property, but also to properties within an additional approximate minimum search distance in order to help assess the likelihood of problems from migrating hazardous substances or petroleum products. Unless stated otherwise the approximate minimum search distances used below were as specified in *ASTM Standard 1527-13*.

5.1 Standard Environmental Record Sources

The regulatory agency database radius report discussed in this section, provided by GeoSearch, Inc. (GeoSearch), was reviewed for information regarding reported use or release of hazardous substances and petroleum products on or near the property. Unless otherwise noted, the information provided by the regulatory agency database report and other sources referenced in this report, were considered sufficient for recognized environmental condition (REC), controlled recognized environmental condition (CREC), historical recognized environmental condition (HREC) or de minimis condition determinations without conducting supplemental agency file reviews. Cardno also reviewed the "unmappable" (also referred to as "orphan") listings within the database report, cross-referencing available address information and facility names. Unmappable sites are listings that could not be plotted with confidence, but are potentially in the general area of the property, based on the partial street address, city, or zip code. Any unmappable site that was identified by Cardno as being within the approximate minimum search distance from the property, based on the site reconnaissance and/or cross-referencing to mapped listings is included in the discussion within this section. The complete regulatory agency database report may be found in **Appendix C**. The following is a summary of the findings of the database review:

Regulatory Database	Minimum Search Distance	Subject Property Listed?	No. of Sites Listed
Federal National Priority List (NPL)	1 mile	No	0
Federal Delisted NPL	1 mile	No	0
Federal Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) list	½ mile	No	0
Federal CERCLIS No Further Remedial Action Planned (NFRAP)	½ mile	No	0
Federal Resource Conservation and Recovery Act (RCRA), Corrective Action facilities (CORRACTS)	1 mile	No	0
Federal RCRIS non-CORRACTS Treatment, Storage, and Disposal Facilities (TSD)	½ mile	No	0
Federal RCRA Generators	¼ mile	No	0

Regulatory Database	Minimum Search Distance	Subject Property Listed?	No. of Sites Listed
Federal Institutional Control/Engineering Control Registry	½ mile	No	0
Federal Emergency Response Notification System (ERNS) list	Property	No	0
Federal Facility Index System/Facility Registry System (FINDS)	Property	No	0
Historic Non-Hazardous Site Inventory	1 mile	No	0
RCRA NonGen/NLR	¼ mile	No	1
State and Tribal NPL	N/A	No	0
State CERCLIS (SHWS and Ga. Non-HSI)	1 mile	No	0
State Landfill or Solid Waste Disposal Sites	½ mile	No	0
State and Tribal Leaking Underground Storage Tanks (LUST)	½ mile	No	7
State and Tribal Registered Underground/Aboveground Storage Tanks (UST)	¼ mile	No	15
State Institutional Control/Engineering Control Registry	½ mile	No	0
State Voluntary Cleanup Site (VCP) database	½ mile	No	0
State Brownfield Sites	½ mile	No	1
State Drycleaners	½ mile	No	0
Non Hazardous Site Inventory	1 mile	No	9

Nine (9) sites located within a ½ mile radius of the target area, were identified during the database search. None of the listed facilities represent a REC/CREC/HREC environmental concern due to distance, anticipated direction of groundwater flow, and/or anticipated risk of contamination. Further details regarding these properties listed on the GeoSearch database that are within a ¼ mile of the Subject Property are provided below.

- **2479 Paul D. West Drive**

Location: 2479 Paul D. West Drive

Subject Property

Summary: This facility is listed on the Brownfields Management System (BF) and the Facility Registry System (FRSGA). This property is listed on the BF database for a Phase I ESA, conducted by Cardno in October 2018 for the FY2017 College Park Assessment Grant – US EPA Cooperative Agreement: #BF-00D59117-0. The

Subject Property is predominantly wooded/undeveloped land with former residential foundation slab. Review of this Phase I ESA produced no additional recognized environmental concerns in connection with the Subject Property.

- **Kathleen Mitchell Elementary School**

Location: Paul D. West Drive

Subject Property

Summary: The former Kathleen Mitchell Elementary School is listed under the FRSGA database. This facility is managed by the US EPA Office of Environmental Information (OEI) as the centrally managed database that identifies facilities subject to environmental regulations or of environmental interest. No records were available with EPA or within the database report. Given the nature of the database and the absence of records, this facility does not appear to have adversely impacted the soil, vapor, and/or groundwater at the Subject Site.

- **BP Station**

Location: 2511 Camp Creek Parkway

Approximately 315 feet away and topographically northwest of Subject Property

Summary: The facility is listed in the GeoSearch database records as an underground storage tank (UST), leaking underground storage tank (LUST), and resource conservation recover act – non-generator (RCRANGR) site. This facility is listed as utilizing four 10,000-gallon gasoline USTs that were reportedly installed in January 1987. In 1991, a release was reported and the site is currently listed as undergoing groundwater monitoring and has been since 2004. This facility is located down-gradient and based on regulatory records review groundwater flow direction at the facility was determined to be to the northeast and away from the Subject Site. Additionally, this facility is listed on the RCRANGR database for ignitable/corrosive waste and benzene; most likely occurring from the reported release. However, no violations or enforcements have been made upon this facility. Based the known groundwater flow direction and absence of releases or violations, this facility does not appear to have adversely impacted the soil, vapor, and/or groundwater at the Subject Site.

- **PreFlight Airport Parking**

Location: 4000 Global Gateway Connector

Approximately 200 feet away and topographically east of the Subject Property

Summary: This facility is listed in the GeoSearch database records as an alternative fueling station (ALTFUELS) site. According to the Georgia EPD records, this facility began offering electricity as an alternative fuel in May 2013 and the station was last reportedly used on September 9, 2019. Based on the distance and no violations have been reported, this facility does not appear to have adversely impacted the soil, vapor, and/or groundwater at the Subject Site.

- **Airpark**

Location: 3889 Herschel Road

Approximately 400 feet away and topographically northwest of Subject Property

Summary: This facility is the location of the current Wally Park Airport Parking. The site is listed in the GeoSearch database records search as the location of two LUST releases, one in November 1991 and the other in February 1998. Both releases have achieved a No Further Action (NFA) status. Based on distance from subject property, inferred groundwater flow direction, and No Further Action status, this facility does not appear to have adversely impacted the soil, vapor, and/or groundwater at the Subject Site.

- **Park N Ride**

Location: 2525 Camp Creek Parkway
Approximately 880 feet away and topographically northwest of Subject Property

Summary: This facility is listed in the GeoSearch database records search as an UST, LUST, and ALTFUELS facility. The facility registered one used oil tank installed in 1986 and removed from the ground in September 1998. The LUST database does not report a release; however, the Georgia EPD issued a NFA for the used oil tank. Additionally, according to the Georgia EPD records, this facility began offering electricity as an alternative fuel in April 2015 and the station was last reportedly used on September 24, 2019. Based on distance, issuance of a NFA, and no violations reported, this facility does not appear to have adversely impacted the soil, vapor, and/or groundwater at the Subject Site.

- **Racetrac #2324**

Location: 2250 Camp Creek Parkway
Approximately 1,450 feet east of Subject Property

Summary: This facility is listed in the GeoSearch database records search as an UST and ALTFUELS site. This facility reportedly utilizes one 20,000-gallon gasoline, one 10,000-gallon diesel, one 10,000-gallon E-10, and one 10,000-gallon gasoline USTs that were reportedly installed in July 2013. Additionally, according to the Georgia EPD records, this facility began offering ethanol (E85) as an alternative fuel in November 2013 and was last reportedly used September 9, 2019. Based on distance and no reported violations, this facility does not appear to have adversely impacted the soil, vapor, and/or groundwater at the Subject Site.

Additional sites were identified within a one mile radius in the GeoSearch database records search of the Subject Property. However, based upon distance and intervening topographic gradient, these facilities are not considered a potential environmental concern to the Subject Site.

5.2 Physical Setting Sources

A GeoSearch Physical Setting Map report is included in **Appendix D**. According to this report, surficial sediments at the site are underlain by Precambrian-Paleozoic age granite gneiss/amphibolite stratified sequence and a mica schist/gneiss/amphibolite stratified sequence.

The USGS 7.5-minute series topographic map of Southwest Atlanta, Georgia shows the Subject Property sloping to the south-southwest and northeast towards tributaries of Camp Creek. Topography ranges from approximately 950 to 1,000 feet above mean sea level (MSL). Based on mapped topography contours, the inferred primary direction of groundwater flow for the vicinity of the Subject

Site is determined to be generally southwest and northeast towards the tributaries of Camp Creek. A USGS Topographic Map is included in **Figure 1**.

A copy of the soil survey inquiry results obtained via the web-based USDA National Resources Conservation Survey is included as **Appendix D**. According to the US Department of Agriculture Natural Resources Conservation Service inquiry, the site is situated in an area primarily comprised of the following soil types:

- Cecil sandy loam complex, 6 to 10 percent slopes, moderately eroded. Typically, this series consists of very deep, well drained moderately permeable soils on ridges and side slopes of the Piedmont uplands. These soils formed in residuum weathered from felsic, igneous and high-grade metamorphic rocks of the Piedmont uplands.
- Rion sandy loam, 10 to 15 percent slopes, moderately eroded. Typically, this series consists of very deep, well drained, moderately permeable soils that formed in material mostly weathered from acid crystalline rocks of the Piedmont uplands.

5.3 Historical Records Sources

5.3.1 Aerial Photographs, Topographic Maps, City Directories, and Sanborn Maps

The objective of consulting historical sources is to determine the likelihood of past uses having led to RECs in connection with the property. A review was conducted of historical aerial photographs (**Appendix E**) and Topographic Maps (**Appendix F**) obtained from GeoSearch. For ease of review, **Figures 4a-n** are also provided to show the approximate property boundary on a representative selection of these historical aerial photos.

Historical City directories are referenced for study areas which help identify changes in land use based on the type of businesses that occupied the Subject Site and surrounding area. The type of business, such as automotive, dry cleaning, gasoline/service stations, etc. are indicative of the possible presence of hazardous substances or petroleum products. Historical use information describing the Subject Property and nearby properties was obtained from GeoSearch from 1951 to 2016. The detailed GeoSearch City Directory report is included in **Appendix G**.

Sanborn Fire Insurance Maps have been produced since the late 1800s to provide information relative to fire hazards on insurable property. These maps often indicate locations of underground and aboveground gasoline tanks, storage facilities for flammable chemicals, such as dry cleaners, paint shops, maintenance and garage facilities, as well as historical information on occupants of buildings, unavailable through other sources. Production of these maps typically was limited to the immediate vicinity of downtown urban areas. Subsequently, no Sanborn maps were available for the Subject Property.

Findings of review of the historical aerial photos, topographic maps, and city directories are chronologically summarized in the following table:

Period	Source(s)	Identified Historical Uses		Comments
		Subject Property	Surrounding Area	
1888	Topographic Map	No visible structures visible on map	No Visible structures visible on map	No RECs noted.
1895	Topographic Map	Similar to previous topographic map.	Atlanta and West Point Rail Road observed to the Southeast	No RECs noted.
1938	Aerial Photo (Figure 4a)	No structures on the Subject Property. Approximately 50% of the Subject Property appears be cleared for agriculture.	The surrounding area appears to be undeveloped and agricultural. Herschel Road is seen along the west property boundary.	No RECs noted.
1951	Aerial Photo (Figure 4b)	The cleared area on the Subject Property appear to be unkempt. A road appears to dead end into the Subject Property at the southeast corner.	New residential developments appear to the east.	No RECs noted.
1952	Aerial Photo (Figure 4c)	Similar to previous aerial photographs.	Similar to previous aerial photographs.	No RECs noted.
1953	City Directories	Street not listed	Street not listed	No RECs noted.
1956	City Directories	No Listing	No Listing	No RECs noted.
1960	City Directories	1500 Paul D. West Drive: Mitchell Kathleen School	Residential	No RECs noted.
1960	Aerial Photograph (Figure 4d)	The former Kathleen Mitchell Elementary School and a residence appears on the Subject Property. A road appears from behind the school to Global Gateway Connector.	More residential homes appear in the surrounding area.	No RECs noted.
1967	City Directories	2480 Paul D. West Drive: Mitchell Kathleen	Residential	No RECs noted.
1968	Aerial Photograph (Figure 4e)	Several new residential homes appear on the Subject Property.	Similar to previous aerial photograph with added residence directly east of the Subject Property Camp Creek Parkway appears to the north.	No RECs noted.
1968	Topographic Map	The former Kathleen Mitchell Elementary School is observed. Several small dwellings appear on at the north boundary and southeast corner of the Subject Property.	Several small dwellings appear in the surrounding area. Shading in the surrounding area indicates a densely populated area.	No RECs noted.
1970	City Directories	2480 Paul D. West Drive: Mitchell Kathleen	Residential	No RECs noted.
1973	Topographic Map	Similar to previous topographic maps.	Similar to previous topographic maps.	No RECs noted.

Period	Source(s)	Identified Historical Uses		Comments
		Subject Property	Surrounding Area	
1974	Aerial Photograph (Figure 4f)	Blurry, similar to previous aerial photographs	Blurry, new residential homes appear at the south adjoining property. A new road development appears to the west	No RECs noted.
1975	City Directories	2480 Paul D. West Drive: Fulton County School Mitchell	2480 Paul D West Drive: Fulton Co SC Mitchell Residential	No RECs noted.
1980	City Directories	2479 Paul D. West Drive: ATL Burglar Alarm/ Brown Eddie/ Brown Enterprises 2480 Paul D. West Drive: Fulton County School Mitchell; Kathleen Mitchell School	Residential	No RECs noted.
1981	Aerial Photograph (Figure 4g)	Similar to previous aerial photographs	Similar to previous aerial photographs	No RECs noted.
1983	Topographic Map	Similar to previous topographic map.	More residential dwellings appear in the surrounding area.	No RECs noted.
1985	City Directories	Brown Eddie/ Brown Enterprises/ Southern Heritage	2480 Paul D West Drive: Fulton Boe Mitchell 2480 Paul D West Drive: Mitchell K School Residential	No RECs noted.
1990	City Directories	Brown Eddie/ Brown Enterprises/ Southern Heritage Corp	2511 Camp Creek Pkwy: Carport AMOCO 2525 Camp Creek Pkwy: Delta Arlins Carport 2480 Paul D West Dr: Mitchel K School/ residential	No RECs noted.
1993	Aerial Photograph (Figure 4h)	Several of the on-site residential homes appear removed.	More commercial development to north and northwest of Subject Property Residential development to north of Subject Property	No RECs noted.
1993	Topographic Map	Similar to previous aerial topographic maps. The residential dwellings appear to have been removed.	Commercial development noticed to north and northwest of Subject Property	No RECs noted.
1994	City Directories	Brown Eddie/ Brown Enterprises/ Southern Heritage Prop	2511 Camp Creek Parkway: AMOCO Food Shop 2525 Camp Creek Pkwy: Carport The/ residential and commercial	No RECs noted.
1997	Topographic Map	Similar to previous aerial topographic maps.	Similar to previous topographic maps.	No RECs noted.
1999	Aerial Photograph (Figure 4i)	There appears to be overgrowth around the former Kathleen Mitchell Elementary School	Similar to previous aerial photograph.	No RECs noted.

Period	Source(s)	Identified Historical Uses		Comments
		Subject Property	Surrounding Area	
2000	City Directories	Brown L Eddie	2511 Camp Creek Pkwy: AMOCO Food Shop 2525 Camp Creek Pkwy: Park 'N Fly Plus Residential and commercial	No RECs noted.
2005	Aerial Photograph (Figure 4j)	Heavily wooded/vacant property. A new road development appears along the east property boundary. The east portion the Site appears to be cleared.	New commercial developments appear to the east.	No RECs noted.
2005	City Directories	No Listing.	2511 Camp Creek Pkwy: AMOCO Food Shop 2525 Camp Creek Pkwy: Park 'N Fly Plus Residential and commercial	No RECs noted.
2009	Aerial Photograph (Figure 4k)	Similar to current condition	Similar to previous aerial photographs.	No RECs noted.
2010	Aerial Photograph (4l)	Similar to current condition	Similar to previous aerial photographs.	No RECs noted.
2011	City Directories	No Listing	2511 Camp Creek Pkwy: AMOCO Food Shop 2525 Camp Creek Pkwy: Park 'N Fly Plus	No RECs noted.
2013	Aerial Photograph (Figure 4m)	Similar to current condition.	Similar to previous aerial photographs.	No RECs noted.
2014	Topographic Map	Similar to previous topographic maps.	Similar to previous topographic maps.	No RECs noted.
2015	Aerial Photograph (Figure 4n)	Similar to current condition.	Similar to previous aerial photographs.	No RECs noted.
2016	City Directories	No Listing	2525 Camp Creek Pkwy: Park 'N Fly Apartments	No RECs noted.

Note: Text in **bold** are potential RECs

In summary, the Subject Property was primarily vacant or undeveloped land until 1960 when it supported the Kathleen Mitchel Elementary School. This school was in operation until the late 1980s or 1990s when it was vacated.

5.3.2 Prior Reports

Phase I ESA – 2479 Paul D. West Drive, October 2018, Cardno, Inc.

Cardno previously conducted a Phase I ESA in October 2018 for the property located at 2479 Paul D. West Drive (Parcel #2; as depicted in **Figure 2b**) under the College Park Assessment Grant US EPA Cooperative Agreement: #BF-00D59117-0. During the Phase I ESA, Cardno did not identify environmental concerns in connection with the Subject Property. Therefore, Cardno recommended no

further environmental investigation for the Subject Property. Excerpts of this Phase I ESA is included as **Appendix I.**

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6 Site Reconnaissance

The following is a summary of visual and/or physical observations of the property on the day of the site visit. Representative photographs can be found in **Appendix A**.

6.1 Methodology and Limiting Conditions

Mr. Douglas Strait, P.E., Project Manager and Ashton Smithwick, Geologist, with Cardno, conducted the site reconnaissance on December 23, 2019. Ms. Strait and Mr. Smithwick subsequently visited the site on March 27 and April 2, 2020 to complete an asbestos and lead-based paint survey, further discussed in Section 9.0. The site reconnaissance consisted of visual and/or physical observations of the property and improvements; adjoining sites as viewed from the property; and, the surrounding area based on visual observations made during the trip to and from the property.

Limiting conditions were identified during the site reconnaissance along the western portion of the Subject Property due to heavy vegetation. However, Cardno was able to visually inspect the entirety of the property from accessible areas.

6.2 Hazardous Substance Use, Storage, and Disposal

Markings denoting a petroleum pipeline were observed parallel with Paul D. West Drive. This pipeline appeared in good condition with no evidence of spills or releases, and a review of environmental databases indicated no reported releases. As such this pipeline is not considered an environmental concern associated with Subject Property.

Cardno did not observe any other indications of hazardous substance use, storage, and disposal on the subject properties.

6.3 Underground Storage Tanks (USTs)

Cardno did not observe indications of USTs on the Subject Property. Cardno visually inspected the boiler room within the former Kathleen Mitchell Elementary School for indication of a heating oil or diesel tank associated with the boiler system; however, no fill ports, vent pipes, or general evidence of a UST were identified.

6.4 Aboveground Storage Tanks (ASTs)

Cardno did not observe indications of ASTs on the Subject Property.

6.5 Other Petroleum Products

Cardno did not observe indications of other petroleum products.

6.6 Polychlorinated Biphenyls (PCBs)

Cardno did not observe indications of PCBs on the Subject Property. Cardno observed the location of a former pad-mounted transformer outside the boiler room of the former Kathleen Mitchell Elementary School; however, the transformer was removed and only the pad remained. No evidence of staining, stressed vegetation, or releases were observed around this pad.

6.7 Unidentified Substance Containers

Cardno observed several buckets around the former Kathleen Mitchell Elementary School area; however, there was no evidence of staining, stressed vegetation, or releases from these buckets and this is therefore considered a *de minimis* condition.

No other unidentified substance containers were observed.

6.8 Nonhazardous Solid Waste

Cardno observed building material debris and tire piles near and south of the former Kathleen Mitchell Elementary School area. No hazardous materials were noted in these debris, and this is considered a *de minimis* condition.

6.9 Wastewater

Cardno did not observe evidence of wastewater being generated at the Subject Property.

6.10 Waste Pits, Ponds and Lagoons

Cardno did not observe evidence of waste pits, ponds, or lagoons at the Subject Property.

6.11 Drains and Sumps

Cardno observed floor drains in the kitchen area of the former Kathleen Mitchell Elementary School. It is likely these drained into the former municipal sewer system, but this could not be confirmed with City staff.

A sump was identified adjacent the boiler in the boiler room of the former Kathleen Mitchell Elementary School. This sump appeared to provide water for the boiler for heating the former school.

No other drains or sumps were observed.

6.12 Septic Systems

Cardno did not observe evidence of septic tank usage.

6.13 Storm Water Management System

Cardno did not observe evidence of any storm water management systems.

6.14 Wells

Cardno did not observe evidence of on-site wells.

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7 Subsurface Vapor Migration

Hazardous gases (vapor) from subsurface sources, such as contaminated soil or groundwater can migrate into residential, commercial, and industrial buildings with any foundation type, including basements, crawlspaces, or slabs. According to EPA guidance, three conditions must exist for hazardous vapors to reach the interior of buildings from the subsurface environment underneath or near a building. First, a source of hazardous vapors must be present in the soil or in groundwater underneath or near a building. Second, vapors must form and have a pathway along which to migrate toward the building. Third, entry routes must exist for the vapors to enter the building, and driving forces must exist to draw the vapors into the building.

Cardno considered the nature and extent of on-site and nearby sources of potential subsurface vapor migration by evaluating the current and historical usage of the property, the construction type and history, the physical setting, and the potential sources of subsurface vapor migration through the review of regulatory agency database information that was summarized in Section 5.0. Based on the evaluation of the known or suspected releases of hazardous substances or petroleum products, their distance from the property, previous soil and groundwater sampling data of surrounding properties, all potential pathways separated by roads with underground utilities, and soil type, et al, no potential subsurface vapor migration sources were determined to represent a recognized environmental condition.

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8 Interviews

8.1 Questionnaires

An All Appropriate Inquiry – End User Questionnaire was completed by Mr. Artie Jones III, Economic Development Director for The City of College Park. Mr. Jones reported no information that would indicate a recognized environmental condition related to the Subject Site. Further information is provided in Section 4 and a copy of the questionnaire is provided in **Appendix B**.

8.2 Interviews

An All Appropriate Inquiry – Interview Questionnaires were not completed by any of the parcel owners. Owner contact information was not provided to Cardno and therefore were unable to elicit any information that would indicate a REC related to the Subject Property. The absence of owner questionnaires a data gap, but it is not considered a significant data gap to impair Cardno's ability to identified environmental conditions.

Cardno contacted Division Chief/Fire Marshal James B. Steele of the College Park Fire Rescue regarding records on file for the Subject Site. At the time this report was finalized, a response had not yet been received.

Cardno requested to interview former employees of the Kathleen Mitchell Elementary School to further discuss the historic use and building systems such as the boiler system; however, as of this issuance of this report, no former employees were available to interview.

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9 Non-Scope Considerations

During the course of this investigation, Cardno completed a comprehensive pre-demolition asbestos and limited lead-based paint (LBP) inspection on the former Kathleen Mitchell Elementary School, Storage Building 1, and Storage Building 2 buildings as depicted on **Figure 3a**. A copy of this report will be provided under a separate cover and is included as **Appendix H**.

No other collection or investigation for the purpose of determining the possible presence of radon, mold, and/or any other potential contaminants requiring specialized testing procedures or sampling were conducted during this investigation. No assessment was conducted for the possible presence or absence of wetlands and no determination is offered with regard to the suitability of the subject site for development or for any other specific use or purpose.

Notwithstanding these limitations, the applicability of certain environmental issues which are not covered by ASTM standards are still germane to a wide array of properties. The following is a summary of non-scope issues identified at the property on the day of the site visit.

9.1 Asbestos Containing Materials

The inspection was performed on March 27 and April 2, 2020 by Mr. Ashton Smithwick and Mr. Douglas Strait, P.E., both Georgia licensed and accredited asbestos inspectors, in accordance with the Asbestos Hazardous Emergency Response Act (AHERA) and Asbestos School Hazard Abatement Reauthorization Act (ASHARA).

In accordance with National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 61 Subpart M, paragraph 145, all asbestos containing materials (ACMs) must be identified and removed prior to disturbance, either during a renovation or demolition. ACM is defined by OSHA as materials that contain greater than 1% asbestos fibers.

The asbestos inspection included a visual inspection of all accessible interior and exterior areas of the on-site buildings. This inspection was performed in accordance with AHERA and ASHARA protocols. Cardno made a reasonable attempt to visually identify all suspect materials or homogeneous areas (HAs). The interior and exterior of the buildings were identified, with the exception of the school building roof due to the overall unsafe condition. Each HA was visually assessed for condition, friability, and quantity.

During the inspection, Cardno collected 71 samples from 28 different HAs throughout each facility of the Subject Property. All bulk samples were collected and stored in appropriate sample containers, labeled, and delivered to Analytical Environmental Services (AES) in Atlanta, Georgia. AES analyzed the samples using Polarized Light Microscopy (PLM) via EPA Method 600/R-93/116. This laboratory is accredited by the National Institute of Standards of Technology (NIST), and is recognized under the National Voluntary Laboratory Accreditation Program (NVLAP).

9.1.1 Asbestos Results

The following materials were identified as containing greater than 1% ACM:

Former Kathleen Mitchell Elementary School

- Gray 9"x9" vinyl floor tile (VFT) with associated black mastic, located throughout the building, totaling approximately 43,000 square feet (SF).

- Joint compound on drywall, located throughout the building, located throughout the building, totaling approximately 6,500 SF.
- Black mastic underlain by white 12"x12" VFT, located throughout the building, totaling approximately 43,000 SF.
- White door caulk on interior door frames, totaling approximately 150 LF.
- Boiler mastic, located in the boiler room, totaling approximately 150 SF.
- 6-inch pipe elbows, located throughout the building, totaling approximately 60 LF.
- 12-inch pipe elbows, located throughout the building, totaling approximately 60 LF.
- White pipe wrap, located throughout the building, totaling approximately 100 LF.
- Transite piping, located in the kitchen, totaling approximately 50 LF.
- Beige window caulk, located in the cafeteria, totaling approximately 180 LF.
- Built-up roof tar, located on the roof, totaling approximately 43,000 SF.
- Gray caulk around fire extinguisher cabinets, located in Halls 1,2 and 3, totaling approximately 60 LF.

A more detailed summary of the inspection, identified ACM, and diagrams of samples and ACM locations will be provided under a separate cover and included as **Appendix H**. Photos of the identified ACM is included as **Attachment A**.

9.2 Lead-Based Paint

A limited lead-based paint (LBP) inspection was conducted on March 27 and April 2, 2020 by Cardno's Mr. Douglas Strait, P.E. and Mr. Ashton Smithwick. All testing was completed in accordance with applicable HUD, state, and federal regulations regarding LBP inspections. No previous LBP sampling information was provided by the client or the property owner.

The LBP testing was performed in general accordance with the inspection protocol in Chapter 7 of the HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing. Painted surfaces were tested by collected paint chips of various painted surfaces throughout the interior and exterior of the buildings. LBP is defined by EPA as containing greater than 0.5% lead in painted materials.

During the inspection, Cardno collected 12 paint chips samples from unique locations throughout the interior/exterior of the on-site buildings, with the exception of the school building roof due to the overall unsafe condition

The paint chip samples were collected into appropriate containers, labeled, and delivered to AES in Atlanta, Georgia. The laboratory analyzed the samples using flame atomic absorption spectrometry (FAAS) via National Institute for Occupational Safety and Health (NIOSH) Method 7082. This laboratory is accredited by the NIST program, and is recognized under the NVLAP. A copy of the analytical results included the laboratory certification will be provided under a separate cover.

9.2.1 **Lead-based Paint Results**

In accordance with EPA, any paint containing 0.5% by weight of lead is categorized as containing lead. Based on the paint chip sampling results, the following painted surface tested positive for lead based paint:

Former Kathleen Mitchell Elementary School

- Interior yellow paint on concrete masonry units (CMU), located in the cafeteria, totaling approximately 80 LF.
- Interior white paint on metal door frame, located in Bathroom 8, totaling approximately 60 LF.
- Interior brown paint on metal door frame, located in Hall 3, totaling approximately 30 LF.

A more detailed summary of the inspection, identified LBP, and diagrams of sample LBP locations will be provided under a separate cover and included as **Appendix H**. Photos of the identified LPB is included as **Attachment A**.

9.3 **Additional Non-ASTM Considerations**

No other collection or any investigation for the purpose of determining the possible presence of radon, mold, and/or any other potential contaminants requiring specialized testing procedures or sampling were conducted during this investigation. No assessment was conducted for the possible presence or absence of wetlands and no determination is offered with regard to the suitability of the subject site for development or for any other specific use or purpose.

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10 Findings and Opinions

Cardno has completed a Phase I Environmental Site Assessment (ESA) of the 55-Acre Commercial Site located in College Park, Fulton County, GA. This report has been prepared in general accordance with *40 CFR Part 312 Standards and Practices for All Appropriate Inquiries* and *ASTM Standard Practices E1527-13 for Environmental Site Assessments*.

10.1 Findings

Phase I ESA investigations seek to identify known or suspect RECs, historical RECs, and de minimis conditions. De minimis conditions are those that are judged to not present a material risk of harm to health or the environment.

- No RECs were identified in connection with the Subject Property.

During the course of the investigation, Cardno completed a comprehensive pre-demolition asbestos and limited lead-based paint survey on the on-site buildings. Cardno identified the following non-scope issues on these buildings:

Asbestos Containing Materials

Asbestos containing materials (ACMs) were identified throughout the interior/exterior of the buildings including:

Former Kathleen Mitchell Elementary School

- Gray 9"x9" vinyl floor tile (VFT) with associated black mastic, located throughout the building, totaling approximately 43,000 square feet (SF).
- Joint compound on drywall, located throughout the building, located throughout the building, totaling approximately 6,500 SF.
- Black mastic underlain by white 12"x12" VFT, located throughout the building, totaling approximately 43,000 SF.
- White door caulk, located in Hall 2 and Hall 3, totaling approximately 150 LF.
- Boiler mastic, located in the boiler room, totaling approximately 150 SF.
- 6-inch pipe elbows, located throughout the building, totaling approximately 60 LF.
- 12-inch pipe elbows, located throughout the building, totaling approximately 60 LF.
- White pipe wrap, located throughout the building, totaling approximately 100 LF.
- Transite piping, located in the kitchen, totaling approximately 50 LF.
- Beige window caulk, located in the cafeteria, totaling approximately 180 LF.
- Built-up roof tar, located on the roof, totaling approximately 43,000 SF.
- Gray caulk around fire extinguisher cabinets, located in Halls 1,2 and 3, totaling approximately 60 LF.

Storage Building 1

- No ACMs were identified in Storage Building 1.

Storage Building 2

- No ACMs were identified in Storage Building 2.

Most of these materials were in very poor condition, and inextinguishable from non-ACM debris. Given the poor condition, all building materials, with the exception of the concrete slab foundation, concrete mason unit (CMU) walling, and metal framing, should be considered friable ACM

Lead-Based Paint

Lead-based paint was identified on various painted surfaces throughout the interior/ exterior of the buildings including:

Former Kathleen Mitchell Elementary School

- Interior yellow paint on concrete masonry units (CMU), located in the cafeteria, totaling approximately 80 LF.
- Interior white paint on metal door frame, located in Bathroom 8, totaling approximately 60 LF.
- Interior brown paint on metal door frame, located in Hall 3, totaling approximately 30 LF.

Storage Building 1

- No LBPs were identified in Storage Building 1.

Storage Building 2

- No LBPs were identified in Storage Building 2.

Most of the identified painted surfaces were in very poor condition, with peeling and deterioration noted.

10.2 Conclusions/Recommendations

- The identified asbestos containing material appeared to be in very poor condition with significant deterioration and damages. The overall condition of the building materials was such that non-ACM debris was inextinguishable from identified ACM debris. Therefore, all building materials, with the exception of the concrete slab, metal framing, and concrete masonry unit (CMU) walling, should be treated as ACM and be removed or abated by a qualified asbestos abatement contractor.
- The identified lead-based paint appeared to be in very poor condition. There are OSHA regulations and requirements which should be taken into consideration during renovation and demolition activities that may disturb any concentration of lead containing building materials or paint. As the property is anticipated to be demolished, due to the presence of lead on various painted surfaces, toxicity characteristic leachate procedure (TCLP) analysis for lead should be conducted on any construction debris to determine if the material should be characterized as a hazardous waste prior to disposal.

- Given the deteriorated and dilapidated condition of the building and amount of identified ACM and LBP, there is a significant public health and safety issue associated with the Former Kathleen Mitchell School. Cardno recommends any City staff, subcontractors, or private citizens entering the school should enter under the use of a Health and Safety Plan (HASP), and wear appropriate personal protection equipment (PPE), including proper respiratory protection.

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11 References

GeoSearch. *Radius Report*, Order Number 139261

GeoSearch. *Sanborn Fire Insurance Map Report*, Order Number 139261

GeoSearch. *Physical Setting Report*, Order Number 139261

GeoSearch. *Aerial Photo Decade Package*, Order Number 139261

GeoSearch. *Historical Topographic Maps*, Order Number 139261

United States Department of Agriculture (USDA), Natural Resources Conservation Service
Custom Soil Resource Report

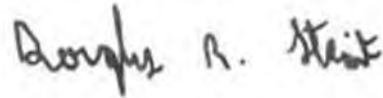
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12 Qualifications/Signatures of Environmental Professional(s)

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 40 CFR Part 312.10. I certify that this report has been prepared in general accordance with 40 CFR Part 312 and *ASTM E 1527-13 Standard Practice for Environmental Site Assessments*.

I further certify that, in my professional judgment, this report meets the requirements of 40 CFR Part 312, Standards and Practices for All Appropriate Inquiries. I have the specific qualifications based on training, experience and registration to perform and/or assist in the assessment of a property of the nature, history and setting of the Subject Property.

for Cardno



Doug Strait
Project Manager

Date: May 7, 2020

I declare this "*Phase I Environmental Site Assessment*" Report meets or exceeds Cardno's standards for editorial content, technical accuracy, and quality assurance verification. All data and calculations presented herein have been checked for accuracy and the basis for all conclusions and recommendations have been described.

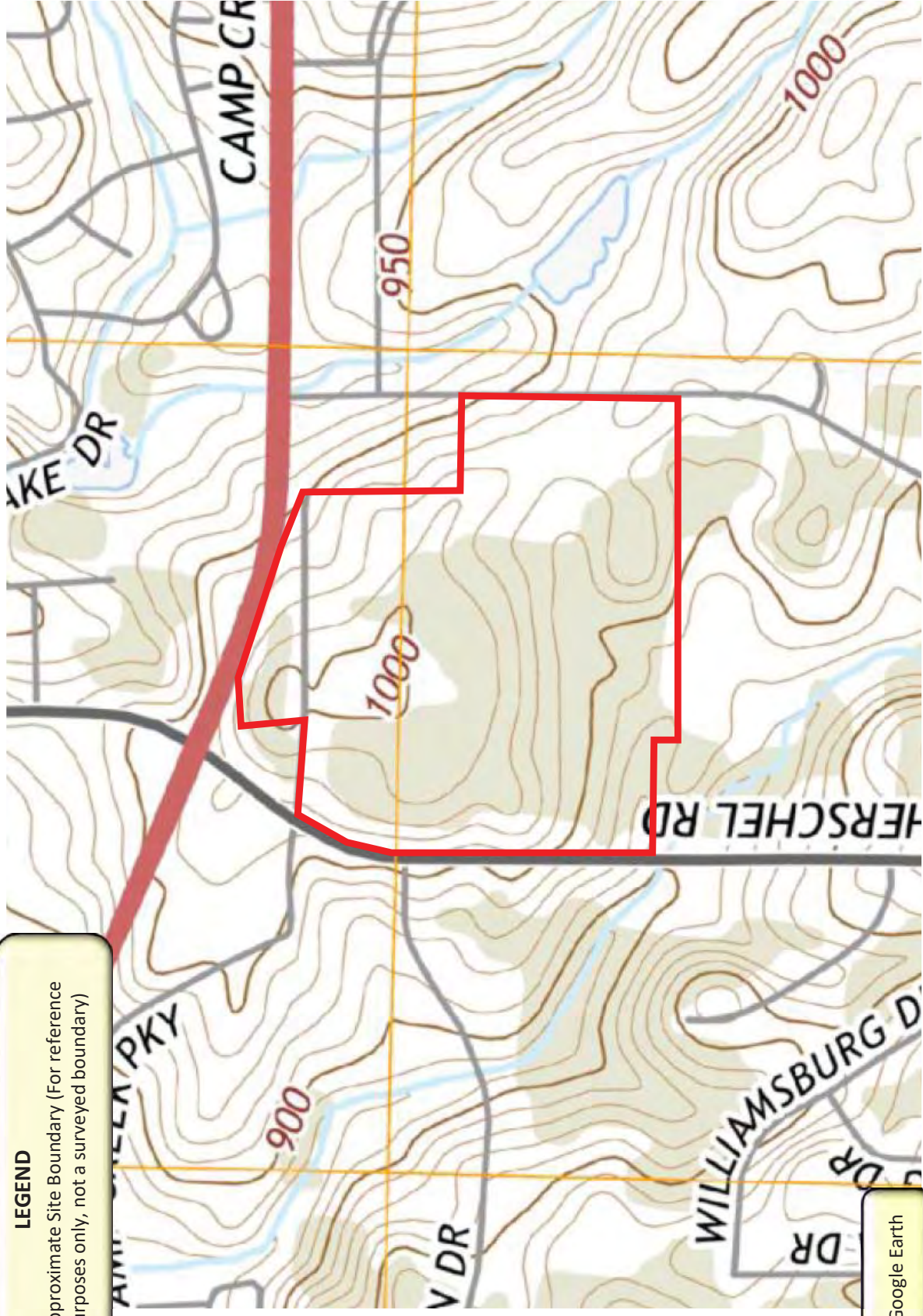
for Cardno




W. Ashton Smithwick
Geologist I

Date: May 7, 2020

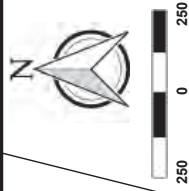
Figures



LEGEND

 Approximate Site Boundary (For reference purposes only, not a surveyed boundary)

Source: Google Earth



"This is not a map of survey."

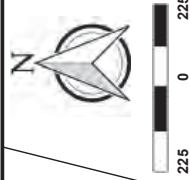
Phase I ESA
55 Acre Site
College Park, Fulton County, Georgia
Project # 0002304013 Phase 2H

Figure 1
USGS Topographic Map

LEGEND

 Approximate Site Boundary (For reference purposes only, not a surveyed boundary)

Source: Google Earth



"This is not a map of survey."

Phase I ESA
55 Acre Site
College Park, Fulton County, Georgia
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Figure 2a
Site Boundary Map



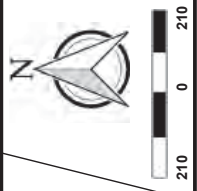
LEGEND

Approximate Site Boundary (For reference purposes only, not a surveyed boundary)

Source: Fulton County Tax Assessor



"This is not a map of survey."



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Figure 2b
Tax Map



LEGEND



Approximate Building Boundary (For reference purposes only, not a surveyed boundary)

Former Kathleen Mitchell
Elementary School

Storage
Building 1

Storage
Building 2

Source: GeoSearch Aerial
Map (1981)

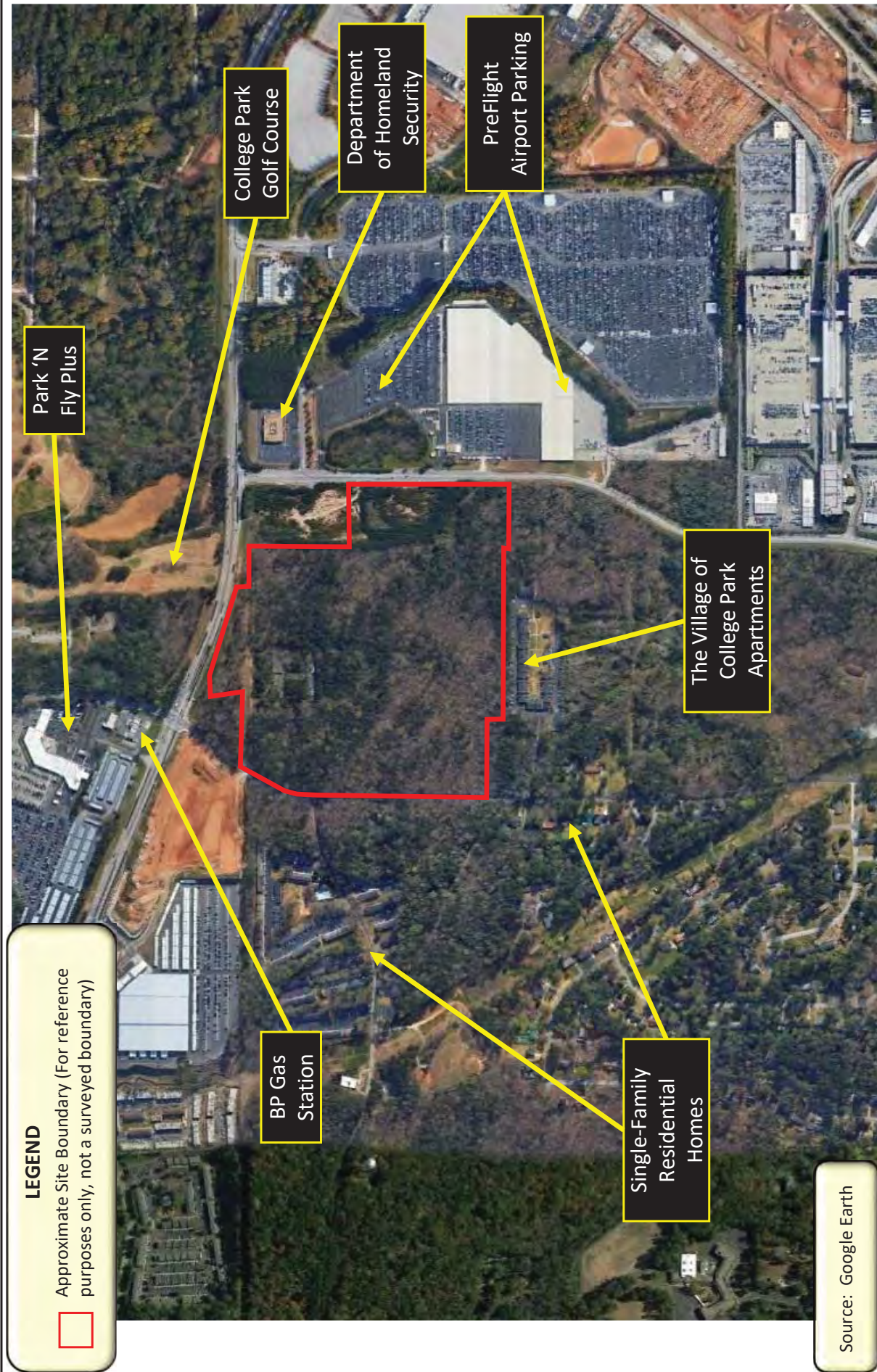


"This is not a map of survey."



ACM/LBP Survey
Former Kathleen Mitchell Elementary School
College Park, Fulton County, Georgia
Project # 0002304013 Phase 2H

Figure 3a
On-Site Land
Use Map

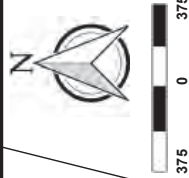


LEGEND

Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



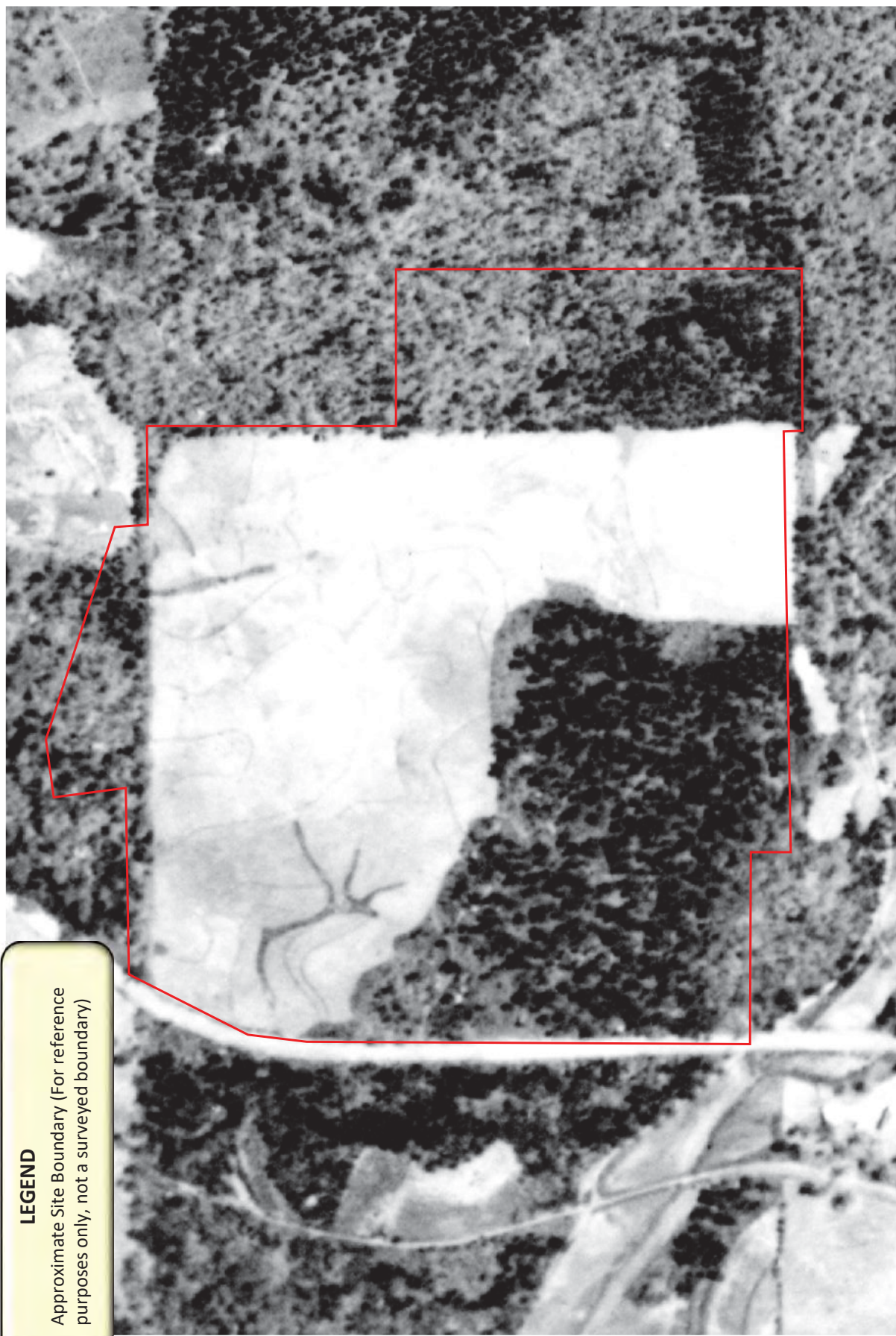
Source: Google Earth



"This is not a map of survey."

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55 Acre Site
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Figure 3b
Surrounding Land Use Map



LEGEND

Approximate Site Boundary (For reference purposes only, not a surveyed boundary)




"This is not a map of survey."

Phase I ESA
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Figure 4a
1938 Aerial Photograph

LEGEND

-  Approximate Site Boundary (For reference purposes only, not a surveyed boundary)




"This is not a map of survey."

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Figure 4b
1951 Aerial Photograph

LEGEND

 Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."

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55 Acre Site
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Project # 0002304013 Phase 2H

Figure 4c
1952 Aerial Photograph

LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."

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55 Acre Site
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Project # 0002304013 Phase 2H

Figure 4d
1960 Aerial Photograph



LEGEND



Approximate Site Boundary (For reference purposes only, not a surveyed boundary)




"This is not a map of survey."

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Figure 4e
1968 Aerial Photograph

LEGEND

-  Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."

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Figure 4f
1974 Aerial Photograph

LEGEND

 Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."

Phase I ESA
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Figure 4g
1981 Aerial Photograph

LEGEND

Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



"This is not a map of survey."

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Figure 4h
1993 Aerial Photograph



LEGEND

 Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



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Figure 4i
1999 Aerial Photograph



"This is not a map of survey."



LEGEND

 Approximate Site Boundary (For reference purposes only, not a surveyed boundary)




"This is not a map of survey."

Phase I ESA
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Figure 4j
2005 Aerial Photograph

LEGEND

 Approximate Site Boundary (For reference purposes only, not a surveyed boundary)




"This is not a map of survey."

Phase I ESA
55 Acre Site
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Figure 4k
2009 Aerial Photograph

LEGEND

 Approximate Site Boundary (For reference purposes only, not a surveyed boundary)




"This is not a map of survey."

Phase I ESA
55 Acre Site
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Project # 0002304013 Phase 2H

Figure 4I
2010 Aerial Photograph

LEGEND

-  Approximate Site Boundary (For reference purposes only, not a surveyed boundary)




"This is not a map of survey."

Phase I ESA
55 Acre Site
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Figure 4m
2013 Aerial Photograph



LEGEND

 Approximate Site Boundary (For reference purposes only, not a surveyed boundary)



Phase I ESA
55 Acre Site
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Project # 0002304013 Phase 2H



"This is not a map of survey."

Figure 4n
2015 Aerial Photograph

Appendix A

Photographic Log

PHOTOGRAPHIC LOG



Client Name: City of College Park
Economic Development Department

Site Location: 55 Acre Commercial Site

Project No.
0002304013

Photo No.
1

Date:
12/23/19

Direction Photo Taken:

East

Description:

Entrance to the former Paul D. West Drive.



Photo No.
2

Date:
12/23/19

Direction Photo Taken:

East

Description:

View of the petroleum pipeline and the former Paul D. West Drive.



PHOTOGRAPHIC LOG



**Client Name: : City of College Park
Economic Development Department**

Site Location: 55 Acre Commercial Site

**Project No.
0002304013**

**Photo No.
3**

**Date:
12/23/19**

Direction Photo Taken:

West

Description:

Undeveloped/wooded land was observed at the northern property boundary.



**Photo No.
4**

**Date:
12/23/19**

Direction Photo Taken:

Southeast

Description:

View of the former Kathleen Mitchell Elementary School from the entrance.



PHOTOGRAPHIC LOG

Client Name: City of College Park
Economic Development Department

Site Location: 55 Acre Commercial Site

Project No.
0002304013

Photo No.

5

Date:

12/23/19

Direction Photo Taken:

N/A

Description:

Classrooms with suspect asbestos-containing materials (ACMs).



Photo No.

6

Date:

12/23/19

Direction Photo Taken:

N/A

Description:

Hallway with suspect ACMs.



PHOTOGRAPHIC LOG

Client Name: City of College Park
Economic Development Department

Site Location: 55 Acre Commercial Site

Project No.
0002304013

Photo No.
7

Date:
12/23/19

Direction Photo Taken:

N/A

Description:

Kitchen with suspect
ACMs.



Photo No.
8

Date:
12/23/19

Direction Photo Taken:

N/A

Description:

A drain was observed
adjacent to the kitchen.



PHOTOGRAPHIC LOG

Client Name: City of College Park
Economic Development Department

Site Location: 55 Acre Commercial Site

Project No.
0002304013

Photo No.
9

Date:
12/23/19

Direction Photo Taken:

Southeast

Description:

Two maintenance sheds were observed southeast of the former school.



Photo No.
10

Date:
12/23/19

Direction Photo Taken:

South

Description:

Several piles of shingles and debris were observed around the former school.



PHOTOGRAPHIC LOG



Client Name: City of College Park
Economic Development Department

Site Location: 55 Acre Commercial Site

Project No.
0002304013

Photo No.
11

Date:
12/23/19

Direction Photo Taken:

North

Description:

Several piles of tires were observed around the former school.



Photo No.
12

Date:
12/23/19

Direction Photo Taken:

East

Description:

Undeveloped/vacant land was observed in the southern portion of the Subject Property near Herschel Road.



PHOTOGRAPHIC LOG

Client Name: City of College Park
 Economic Development Department

Site Location: 55 Acre Commercial Site

Project No.
 0002304013

Photo No.
13

Date:
 12/23/19

Direction Photo Taken:

North

Description:

View of the Subject Property from the The Village of College Park Apartments.



Photo No.
14

Date:
 12/23/19

Direction Photo Taken:

West

Description:

Undeveloped/vacant land was observed in the eastern portion of the Subject Property near Global Gateway Connector



PHOTOGRAPHIC LOG



Client Name: City of College Park
Economic Development Department

Site Location: 55 Acre Commercial Site

Project No.
0002304013

Photo No.
15

Date:
12/23/19

Direction Photo Taken:

South

Description:

View of the Subject
Property from Camp Creek
Parkway.



Photo No.
16

Date:
12/23/19

Direction Photo Taken:

Northeast

Description:

The Village of College Park
Apartments is located at
the south adjoining
property.



PHOTOGRAPHIC LOG

Client Name: City of College Park
Economic Development Department

Site Location: 55 Acre Commercial Site

Project No.
0002304013

Photo No.
17

Date:
12/23/19

Direction Photo Taken:

East

Description:

The PreFlight Airport Parking facility is located at the east adjoining property.



Photo No.
18

Date:
12/23/19

Direction Photo Taken:

Northeast

Description:

Camp Creek Parkway is observed at the north adjoining property.

